

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Jonathan Hanon,

1:23-cv-08194-JMF

Plaintiff,

Affirmation in support of attorney withdrawal

—against—

LEGOLAND New York LLC.

Defendants.

T. Austin Brown, Esq., outgoing attorney for Plaintiff states the following under penalty of perjury:

1. I am the outgoing attorney for the plaintiff.
2. Since prior to December 19, 2023, I have been working with incoming counsel on this case to ensure that incoming counsel is prepared in the event that I need to withdraw from this case.
3. I have recently been employed by The New York Office of the Attorney General as Assistant Attorney General.
4. Section 74 of the New York Public Officers Law, which applies to Assistant Attorneys General, is generally considered to forbid the private practice of law by AAGs, and thus compels me to close my private practice, and to withdraw from representing the Plaintiff in this case.
5. Because Mr. Kasell, the incoming counsel, has been prepared in advance, and this is done with the consent of the client, there should be no prejudice to any party should the court permit me to withdraw.
6. No request is being made at this time for any adjournment or extension of time, and the case should not be disrupted by this change of attorney pursuant to Local Civil Rule 1.4.

7. I am maintaining a charging lien on the file for my expenses so far in this case, along with the regularly billed hours that I recorded for time I spent working on this case.

*January 7, 2024*

A handwritten signature in black ink, appearing to read 'T. Austin Brown', with a long horizontal line extending to the right.

T. Austin Brown, Esq.  
Outgoing Counsel